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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

SRI INTERNATIONAL, INC., a California Corporation, Plaintiff and Counterclaim-Defendant, v. INTERNET SECURITY SYSTEMS, INC., a Delaware corporation, INTERNET SECURITY SYSTEMS, INC., a Georgia corporation, and SYMANTEC CORPORATION, a Delaware corporation, Defendants and Counterclaim-Plaintiffs.	C. A. No. 04-1199 (SLR)

JOINT CLAIM CONSTRUCTION STATEMENT

Pursuant to the Court's Rule 16 Scheduling Order in this matter, the Parties hereby submit the following claim chart to present their respective, proposed constructions of disputed claim terms and their proposed constructions of agreed claim terms in the four patents-in-suit, namely, U.S. Patent Nos. 6,321,338 ("the '338 patent), 6,484,203 ("the '203 patent"), 6,708,212 ("the '212 patent"), and 6,711,615 ("the '615 patent").

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Joint Claim Constructions Statement

Terms which one or more parties contend require construction:

PATENT(S)	CLAIM TERM	SRI CONSTRUCTION	ISS CONSTRUCTION	SYMANTEC CONSTRUCTION
all patents (multiple claims)	network monitor monitor	Process or component in a network that can analyze data; depending on the context in specific claims, the network monitor may analyze network traffic data, reports of suspicious network activity or both. Service monitors, domain monitors and enterprise monitors are examples of network monitors.	generic code that can be dynamically configured and reconfigured with reusable modules that define the monitor's inputs, analysis engines and their configurations, response policies and output distribution for its reports	software that can be dynamically configured to collect, analyze and respond to suspicious network activity, and that includes one or more analysis engines and a resolver that implements a response policy
'615, '203 and '212 (multiple claims)	deploying a plurality of network monitors	SRI does not believe the term needs construction but, if construed, should be construed to mean locating two or more network monitors so as to allow them to receive data to be monitored and/or to send information.	installing and configuring two or more network monitors so that together they form an analysis hierarchy defined by the network monitors' inputs and output distribution	installing and configuring two or more *network monitors*
'615, '203 and '212 (multiple claims)	hierarchical monitor hierarchically higher network monitor	Process or component in a network that receives reports from at least one lower-level monitor.	a network monitor that receives reports as input from one or more network monitors that are at a lower layer in the analysis hierarchy	a *network monitor* that receives reports from one or more *network monitors* at a lower layer in a hierarchy

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PATENT(S)	CLAIM TERM	SRI CONSTRUCTION	ISS CONSTRUCTION	SYMANTEC CONSTRUCTION
	hierarchical event monitoring [and analysis]	monitoring events through the use of a hierarchical monitor	monitoring and analyzing events through the use of network monitors that are configured to form an analysis hierarchy of two or more layers	Symantec does not believe the term needs construction.
'203, '212 and '615 (multiple claims)	service monitor	SRI does not believe the term needs construction but, if construed, should be construed to mean a network monitor that analyzes data from individual components or services.	a *network monitor* that provides local real-time analysis of network packets handled by a network entity	a *network monitor* that provides local real-time analysis of network packets handled by a network entity
'203, '212 and '615 (multiple claims)	domain monitor	SRI does not believe the term needs construction but, if construed, should be construed to mean a network monitor that analyzes data from a domain.	a *network monitor* that receives and analyzes intrusion reports disseminated by *service monitors*	a *network monitor* that correlates intrusion reports disseminated by *service monitors*
'203, '212 and '615 (multiple claims)	enterprise monitor	SRI does not believe the term needs construction but, if construed, should be construed to mean a network monitor that analyzes data from an enterprise, i.e. a collection of domains.	a *network monitor* that receives and analyzes intrusion reports disseminated by *domain monitors*	a *network monitor* that correlates intrusion reports disseminated by *domain monitors*

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PATENT(S)	CLAIM TERM	SRI CONSTRUCTION	ISS CONSTRUCTION	SYMANTEC CONSTRUCTION
'203, '212 and '615 (multiple claims)	peer-to-peer relationships	SRI does not believe the term needs construction but, if construed, should be construed to mean relationships between two or more entities at the same level in a hierarchy.	relationships where entities at the same layer in a hierarchy receive reports from one another	relationships comprising communication between two or more entities at the same layer in a hierarchy or not in a hierarchy
'615 (multiple claims) '203 (multiple claims)	based on analysis of network traffic data *selected from one or more* of the following categories… based on analysis of network traffic data *selected from* the following categories…	SRI does not believe the phrase needs construction.	analysis is based on one or more of the following categories	analysis is based on one or more of the following categories
'615, '203 and '212 (multiple claims)	automatically receiving and integrating the reports of suspicious activity	Without user intervention, receiving reports and combining those reports into another functional unit.	automatically receiving and combining the reports of detected suspicious network activity	automatically receiving and combining the reports of detected suspicious network activity

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Joint Claim Constructions Statement

PATENT(S)	CLAIM TERM	SRI CONSTRUCTION	ISS CONSTRUCTION	SYMANTEC CONSTRUCTION
'615, '203 and '212 (multiple claims) '338 claim 15	wherein integrating comprises *correlating* intrusion reports reflecting underlying commonalities a network monitor that *correlates* activity in the multiple network monitors based on the received event records	Combining the reports based on underlying commonalities between them.	determining relationships among the reports of detected suspicious network activity	determining relationships among the reports of detected suspicious network activity
'338 (multiple claims) '203, '212 and '615 (multiple claims)	responding… invoking countermeasures	Taking an action in response.	taking an action in response to a suspected attack, including passive responses such as report dissemination to other monitors or administrators, and highly aggressive actions, such as severing a communication channel or the reconfiguration of logging facilities within network components	taking an action in response

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PATENT(S)	CLAIM TERM	SRI CONSTRUCTION	ISS CONSTRUCTION	SYMANTEC CONSTRUCTION
'338 patent (multiple claims)	building at least one long-term and at least one short-term statistical profile from at least one measure of the network packets	Creating at least one statistical description representative of historical network activity, and creating at least one statistical description of recent network activity, where the descriptions are based on one or more measures of network packets.	*See below.*	*See below.*
	building at least one long-term … statistical profile from at least one measure	*See above.*	automatically generating and updating a description of network activity based on an exponentially aged probability distribution of historically observed values of one or more measures	automatically generating and updating an exponentially aged probability distribution of historically observed activities from at least one measure
	building … at least one short-term statistical profile from at least one measure	*See above.*	automatically generating and updating a description of network activity based on an exponentially aged probability distribution of recently observed values of one or more measures	automatically generating and updating an exponentially aged probability distribution of recently observed activities from at least one measure

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Joint Claim Constructions Statement

PATENT(S)	CLAIM TERM	SRI CONSTRUCTION	ISS CONSTRUCTION	SYMANTEC CONSTRUCTION
'338 claims 1, 11, 21, 24, 25	determining whether the difference between the short-term statistical profile and the long-term statistical profile indicates suspicious network activity	SRI does not believe the term needs construction but, if construed, should be construed to mean using the result of the comparison to decide whether the monitored activity is suspicious.	determining whether the difference between the *short-term statistical profile* and *long-term statistical profile* exceeds a threshold that is empirically determined to indicate suspicious activity based on the historically adaptive deviation between the two profiles, requiring no prior knowledge of suspicious activity	determining whether the quantitative difference between the *short-term statistical profile* and the *long-term statistical profile* exceeds a difference which is historically-adaptive for the monitored network, thereby indicating suspicious network activity. This determination requires no prior knowledge of suspicious network activity.
'212 and '615 (multiple claims)	a statistical detection method	SRI does not believe the term needs construction but, if construed, should be construed to mean a method of detecting suspicious network activity by applying one or more statistical functions in the analysis of network traffic data.	a method that builds a statistical profile of historically observed network traffic activity and a statistical profile of recently observed activity and finds suspicious network activity when the difference between the two exceeds a threshold that is empirically determined to indicate suspicious activity based on the historically adaptive deviation between the two profiles, requiring no prior knowledge of suspicious activity	A method of detecting suspicious network activity which comprises building a *long-term statistical profile* and a *short-term statistical profile*. This method requires no prior knowledge of suspicious network activity. This method is not a signature matching detection method or threshold analysis.

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PATENT(S)	CLAIM TERM	SRI CONSTRUCTION	ISS CONSTRUCTION	SYMANTEC CONSTRUCTION
'212 (multiple claims)	a signature matching detection method	SRI does not believe the term needs construction but, if construed, should be construed to mean a method of detecting suspicious network activity by comparing observed network traffic data to known patterns.	a method of detecting suspicious network activity which comprises comparing observed network traffic data to known patterns or thresholds	a method of detecting suspicious activity which comprises comparing observed network traffic data to known patterns or thresholds
'203, '212 and '615 (multiple claims) **[AGREED]**	a plurality	More than one.	more than one	more than one
'338 claims 20 and 25 **[AGREED AS TO MEANING]** '615 claim 74	wherein the network entity comprises a *virtual private network* entity receiving packets at a *virtual private network* entity the enterprise network is a *virtual private network* (VPN)	SRI does not believe the term needs construction but, if construed, should be construed to mean a network that uses encryption to securely transmit network packets via a public network.	a network that uses encryption to securely transmit network packets via a public network	a network that uses encryption to securely transmit network packets via a public network

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PATENT(S)	CLAIM TERM	SRI CONSTRUCTION	ISS CONSTRUCTION	SYMANTEC CONSTRUCTION
'615 (multiple claims) **[AGREED AS TO MEANING]**	firewall	SRI does not believe the term needs construction but, if construed, should be construed to mean an interface between two networks that enforces a security policy.	an interface between two networks that enforces a security policy	an interface between two networks that enforces a security policy
all patents	proxy server	SRI does not believe the term needs construction but, if construed, should be construed to mean a server that mediates communication between a client application, such as a Web browser, and a real server. It handles requests to the real server to see if it can fulfill the requests itself. If not, it forwards the request to the real server.	a firewall component that enforces a security policy for a specific application or service	a firewall component that enforces a security policy for a specific application or service

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CERTIFICATE OF SERVICE

I hereby certify that on March 17, 2006, I electronically filed with the Clerk of Court the attached **JOINT CLAIM CONSTRUCTION STATEMENT** using CM/ECF which will send electronic notification of such filing(s) to the following Delaware counsel. In addition, the filing will also be sent via hand delivery:

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I also certify that on March 17, 2006, I mailed by United States Postal Service and by electronic mail, the above document(s) to the following non-registered participants:

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